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United States Environmental Protection Agency



Port Wentworth Caustic Spill

Port Wentworth, GA - EPA Region IV



Site Contact:
Perry Gaughan
On Scene Coordinator
gaughan.perry@epa.gov

300 O'Leary Road
Port Wentworth, GA
epaosc.org/ptwentcaustic

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NRC# 893294 On Friday, December 26th 2008, USCG MSU Savannah requested assistance from Reg 4 ERRB with a caustic spill along O'Leary Road in Port Wentworth, Georgia. OSC Perry Gaughan was dispatched by phone duty to assist with investigating the source of the spill as well as identifying a potential responsible party.

For additional information, visit the **Pollution Report (POLREPs)** section.

Bulletins

None for this site.

Images



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POLREPs

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10952280

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Wednesday, February 04, 2009

From: Perry Gaughan

Subject: and Final - Disposal of Contaminated Soil and Liquids
Port Wentworth Caustic Spill
300 O'Leary Road, Port Wentworth, GA

POLREP No.:	3	Site #:	
Reporting Period:	Jan 26 thru Feb 28, 2009	D.O. #:	
Start Date:	12/26/2008	Response Authority:	CERCLA
Mob Date:	12/26/2008	Response Type:	Emergency
Demob Date:	2/28/2009	NPL Status:	Non NPL
Completion Date:	3/15/2009	Incident Category:	Removal Action
CERCLIS ID #:		Contract #	
RCRIS ID #:			

Site Description

On Wednesday, December 24th 2008, a Port Wentworth city employee notified GaEPD of an apparent spill along OLeary Road migrating toward a creek. GaEPD's Jeff Barnes responded and notified USCG Savannah of the spill. Through field testing Barnes determined that the material was corrosive and most likely caustic solution (sodium hydroxide).

USCG activated CERCLA funding through CANAPS to begin emergency clean up operations and hired Moran Environmental of Savannah. Approximately 2500 gallons of corrosive liquid was pumped into vac trucks and 140 cubic yards of contaminated soil was removed from the ditchline and placed into roll off boxes.

EPA ERRB Region 4 assumed clean up of the caustic spill when the probable responsible party refused to take responsibility for the spill.

Current Activities

During the week of Jan 26th 2009, ERRs transportation and disposal coordinator arranged for the disposal of 200 cubic yards of contaminated soil and 7500 gallons of corrosive liquids collected from the ditchline over the previous few weeks.

On Wednesday, Feb 4th, 2009. ERRs began transporting 7500 gallons of corrosive liquids from two frac tanks, one staged at Moran Environmental facility in Savannah and 4000 gallons from the frac tank staged on site. Approximately 3000 gallons staged at the Moran facility was found to have a pH of 13 which required its pretreatment and transportation to IWS Environmental, Jacksonville, Fl.

In addition, ERRs began loading the contaminated soil staged on site to dump trucks for disposal at the Republic Landfill near Savannah. Over the next two days, 12 loads of contaminated soil were taken to Republic for disposal. During these operations, ERRs located a local top soil provider and arranged for the soil to be tested by a local lab for possible contaminants before backfilling and

grading operations. Once the soil was found to be free of metals and volatile organics, twelve loads of topsoil were brought on site and graded into the previously excavated areas and ditchline. A local landscaper was subcontracted to hydroseed all graded areas with a winter blend of rye and centipede grass to promote winter growth.

Key Issues

No further actions anticipated.

epaossc.org/ptwentcaustic

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Wednesday, February 04, 2009

From: Perry Gaughan

Subject: Clean up Efforts Continue
Port Wentworth Caustic Spill
300 O'Leary Road, Port Wentworth, GA

POLREP No.:	2	Site #:	
Reporting Period:	01/05/09 thru 01/10/09	D.O. #:	
Start Date:	12/26/2008	Response Authority:	CERCLA
Mob Date:	12/26/2008	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	
RCRIS ID #:			

Site Description

On Wednesday, December 24th 2008, a Port Wentworth city employee notified GaEPD of an apparent spill along O'Leary Road migrating toward a creek. GaEPD's Jeff Barnes responded and notified USCG Savannah of the spill. Through field testing Barnes determined that the material was corrosive and most likely caustic solution (sodium hydroxide).

USCG activated CERCLA funding through CANAPS to begin emergency clean up operations and hired Moran Environmental of Savannah. Approximately 2500 gallons of corrosive liquid was pumped into vac trucks and 140 cubic yards of contaminated soil was removed from the ditchline and placed into roll off boxes.

Current Activities

Based on conversations between EPA attorneys and the potential RP, the OSC tasked ERRs contractors (WRS Inc.) to move personnel and equipment to the site to excavate remaining caustic from approx 250 yards of ditchline along O'Leary Road.

epaossc.org/ptwentcaustic

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Sunday, December 28, 2008

From: Perry Gaughan

Subject: Initiation of Clean Up
Port Wentworth Caustic Spill
300 O'Leary Road, Port Wentworth, GA

POLREP No.:	1	Site #:	
Reporting Period:		D.O. #:	
Start Date:	12/26/2008	Response Authority:	CERCLA
Mob Date:	12/26/2008	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	
RCRIS ID #:			

Site Description

On Wednesday, December 24th 2008, a Port Wentworth city employee notified GaEPD of an apparent spill along OLeary Road migrating toward a creek. GaEPD's Jeff Barnes responded and notified USCG Savannah of the spill. Through field testing Barnes determined that the material was corrosive and most likely caustic solution (sodium hydroxide).

USCG activated CERCLA funding through CANAPS to begin emergency clean up operations and hired Moran Environmental of Savannah. Approximately 2500 gallons of corrosive liquid was pumped into vac trucks and 150 yards of contaminated soil was removed from the ditchline and placed into roll off boxes.

On Friday, December 26th 2008, USCG Savannah notified Reg 4 Phone Duty OSC Karen Buerki that the clean up was entering more of an investigative stage and requested assistance from the region.

Current Activities

On Friday, December 26th, OSC Perry Gaughan mobed to Port Wentworth and met with USCG's Kevin Lynn. Lynn briefed the OSC on clean up measures to date and the OSC agreed to assist with sampling support and additional ERRs support as needed.

The following day, Saturday December 27th, the OSC met with a potential responsible party, Horizon Tank Lines and inquired to any losses of product or vandalism from their tankers staged along the fenceline of the migration pathway. The terminal manager stated that to his knowledge no product had been lost. The OSC contacted Horizon's owner, Charles Collie briefed him on GaEPD's findings and USCG findings to date and Horizon sent their Director of Operations, John McKethin to the site. Moran Environmental continued removing caustic liquid from the ditchline and an additional 400 gallons of product was collected on Saturday.

On Sunday, December 28th, the OSC met with Mr McKethin to review the spill along the

fenceline and ditchline along OLeary Road. Mr McKethin stated that he had interviewed nearly all of Horizon's truck drivers and that no spills had been reported or noticed. He also stated that he reviewed all of Horizon's paperwork and that no discrepancies in delivery amounts were noted. He essentially stated that Horizon could account for all of their caustic deliveries.

Based on the information from Horizon, the OSC elected to conduct additional sampling from the fenceline and ditchline in an effort to further define the chemical nature of the spill. The OSC tasked EPA's technical contractor, Tetra Tech to move to the site the following day to collect additional samples.

Next Steps

EPA to continue investigating origin of the spill.

epaossc.org/ptwentcaustic

**U.S. ENVIRONMENTAL PROTECTION AGENCY
EMERGENCY ACTION MEMORANDUM**

Date: December 30, 2008

Subject: **NOTIFICATION OF ACTIVATION under \$250,000**
Port Wentworth Caustic Spill
306 O'Leary Road
Port Wentworth, Georgia 31407

From: Perry Gaughan, OSC, U.S. EPA Region 4

To: Regional Response Center, 4SF-ERRB
GAEPD
EPA-HQ Regional Coordinator

Site No: A4XQ	Task Order No: 0703-F4-0028
Initial TO Amount: \$40,000	Contractor: WRS Compass
CERCLIS No: GAN000410326	ERNS No: 893294
Response Authority: CERCLA	NPL Status: Non-NPL
State Notification: 12/24/08	Start Date: 12/29/08
Demobilization Date: TBD	Completion Date: TBD

I. INTRODUCTION

A removal site evaluation was performed during an Emergency Response on December 26, 2008, by the On-Scene Coordinator (OSC) with representatives from the U.S. Coast Guard (USCG) and the Georgia Environmental Protection Division (GAEPD). In accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300.410, the OSC has determined that there is a threat to public health or welfare or the environment posed by the presence of more than 2000 gallons of caustic liquid in an unsecured drainage ditch on O'Leary Road in Port Wentworth, Georgia. This liquid has a pH of 13-14 and is a CERCLA Hazardous Substance. The OSC has determined that the Site meets the criteria for initiating a Removal Action under Section 300.415 of the NCP. As a result of Site conditions, immediate action pursuant to Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), is needed at the Site.

Pursuant to Delegation 14-1-A, authority to obligate emergency CERCLA funding in the amount of \$165,000 to initiate removal/stabilization actions has been delegated to the OSC. The OSC has approved the use of CERCLA funding to mitigate the threat to public health, welfare and the environment at the Port Wentworth Caustic Spill Site.

II. BACKGROUND

EPA received NRC Report #893294 on December 24, 2008. Follow-up with GAEPD showed that the USCG was on-scene performing the response with Moran Environmental. On December 26, 2008, the USCG requested assistance from EPA in evaluating the extent and potential sources of the release. R1 OSC Perry Gaughan was dispatched to the scene.

III. THREAT

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a Removal Action. The selected criteria from paragraphs (b)(2) (i), (iv), (v), and (vii) directly apply as follows to the conditions at the Site:

- 300.415 (b)(2)(i) "Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants"

The spill occurred in an unsecured drainage ditch along a public road leaving it exposed to the public.

- 300.415 (b)(2)(iv) ■High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate•

The spill occurred in an unsecured drainage ditch along a public road and will migrate during rainfall events.

- 300.415 (b)(2)(v) "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released"

The spill occurred in an unsecured drainage ditch along a public road and will migrate during rainfall events.

- 300.415 (b)(2)(vii) "The availability of other appropriate Federal or State response mechanisms to respond to the release"

GAEPD is unable to fund the response and the USCG who responded initially has requested EPA take over the response.

IV. SCOPE OF WORK

With the \$165,000 emergency funding, the OSC proposes to remove caustic liquids,

excavate contaminated soil, and provide for analytical and disposal of both wastes.

The authorized budget for this \$165,000 removal is:

ERRS	\$ 105,000
START	\$ 40,000
EPA	\$ 20,000
 TOTAL	 \$165,000

V. OSC ACTION

On December 29, 2008, the OSC determined that an imminent and substantial threat exists at the Site. The OSC initially activated \$55,000 to initiate a Removal Action to mitigate the threat to human health and the environment. The OSC issued a Task Order to ERRS contractor WRS Compass in the amount of \$40,000 to initiate a Removal Action to mitigate the threat to human health and the environment. In addition, \$15,000 was distributed to EPA's START contractor, Tetra Tech to provide sampling and document support of the response effort.

Based on physical and chemical evidence of substantial ditchline contamination after the initial clean up efforts by the USCG's environmental contractors, the OSC determined that additional contaminated soil removal was necessary. On January 13th, the OSC requested additional funding for ERRs (\$65,000) and START (\$25,000) to complete clean up and site restoration efforts. This brings the total ceiling of this emergency response to \$165,000.

Because the conditions at the Site meet the conditions set forth in Section 300.415 of the NCP for an immediate removal, the OSC has initiated funding of this Removal Action.

Perry Gaughan, OSC
EPA Region 4
Atlanta, Georgia

UNCLAS

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FM COGARD MSU SAVANNAH GA

TO CCGDSEVEN MIAMI FL//DR/DP/DRM/DRMC/DWP//

INFO COMDT COGARD WASHINGTON DC//G-MOR/G-OPF//

COMLANTAREA COGARD PORTSMOUTH VA//AR/AP//

COGARD NSFCC ELIZABETH CITY NC

COGARD NATIONAL RESPONSE CENTER WASHINGTON DC

COMCOGARD NPFC WASHINGTON DC

COGARD FINCEN CHESAPEAKE VA//ORGQ//

COMCOGARD MLC LANT NORFOLK VA//FCP-2//

COMCOGARD SECTOR CHARLESTON SC

COGARD STA TYBEE GA

BT

UNCLAS //N16465//

OPER/SODIUM HYDROXIDE SOLUTION SPILL//

MSGID/SITREP/COGARD MSU SAVANNAH GA//

SUBJ/SITREP-POL FIVE/ACTUAL MINOR, POTENTIAL 3500 GALLON SPILL OF
SODIUM HYDROXIDE SOLUTION INTO THE O'LEARY ROAD DRAINAGE DITCH,
PORT WENTWORTH, GEORGIA (LAT N32-11.583, LONG W081.11.456), CPN
C09035, MISLE CASE NO. 436959//
NARR/EPA OSC TOOK OVER REMOVAL ACTIONS EFFECTIVE 31 DEC 08. MSU
SAVANNAH IS PROVIDING CONTRACTOR OVERSIGHT AS REQUESTED BY EPA OSC.
RMKS/1. SITUATION.
A. OVERVIEW: ON 30 DEC 08, EPA OSC AND FOSCR CONDUCTED A SITE VISIT
JUST PRIOR TO SUNSET. THE DAY WAS SUNNY AND WARM WITH NO
PRECIPITATION, AND DURING THAT VISIT A WHITE, POWDERY RESIDUE HAD
APPEARED IN DIVISION BRAVO. THIS, COUPLED WITH THE SPILL SAMPLE
ANALYSIS RESULTS RECEIVED EARLIER THAT DAY HELPED FORTIFY OUR
POSITION THAT THE SPILLED PRODUCT WAS SODIUM HYDROXIDE. ON 31 DEC
08 THE EPA OSC ISSUED A NOTICE OF FEDERAL INTEREST TO HORIZON TANK
LINES. THE USCG FOSCR WAS ALSO ADVISED THAT MORAN ENVIRONMENTAL
RECOVERY WAS NOW UNDER CONTRACT WITH THE EPA THROUGH EPA PROJECT
A4XQ. MSU SAVANNAH IS AVAILABLE TO PROVIDE ASSISTANCE TO THE EPA
OSC AS REQUESTED.
B. EFFORTS TO IDENTIFY RP: EPA OSC ISSUED NOTICE OF FEDERAL
INTEREST TO HORIZON TANK LINES.

C. 31 DEC 08 OPERATIONS: EPA OSC TOOK OVER REMOVAL ACTIONS.

D. O/S WX: 65 DEGREES, WINDS S AT 11 KTS, MOSTLY CLOUDY.

E. VESSEL DATA: N/A.

F. OWNER/OPERATOR: SUSPECTED RP IS HORIZON TANK LINES, 306 O'LEARY
RD, PORT WENTWORTH, GA 31407. PHONE NUMBER IS 912-965-1976.

G. SAR STATUS: N/A.

H. CG RESOURCES SUMMARY: 01 FOSCR, 01 POLLUTION INVESTIGATOR.

I. RESOURCES AT RISK: PER SITREP-POL TWO.

J. ECONOMIC IMPACT: NONE.

K. KEY STAKEHOLDER ISSUES: NONE.

L. HEALTH AND HUMAN SAFETY FACTORS: NONE.

M. MEDIA INTEREST: NONE.

N. CASUALTY INFORMATION: N/A.

O. INCIDENT/UNIFIED COMMAND STATUS: USCG IS NO LONGER THE LEAD
FEDERAL AGENCY ON THIS CASE.

2. ACTION TAKEN:

A. 302230Z DEC 08: EPA OSC CONTACTS USCG FOSCR AND REQUESTS
PRESENCE FOR SITE VISIT. USCG FOSCR ARRIVED ON-SCENE AND OBSERVED A
WHITE, POWDERY RESIDUE HAD APPEARED IN DIVISION BRAVO. EPA OSC AND
USCG FOSCR DISCUSS LIKELINESS THAT THE SPILLED PRODUCT IS SODIUM

UNCLAS

HYDROXIDE.

B. 311900Z DEC 08: USCG FOSCR ADVISED BY POLLUTION INVESTIGATOR THAT MORAN ENVIRONMENTAL IS UNDER CONTRACT THROUGH EPA FOR REMOVAL ACTIONS AT THE SPILL SITE.

3. ADDITIONAL INFO.

A. BRIGHT LINE TEST: N/A.

B. CPN INFORMATION: C09035.

C. CONTRACTORS: MORAN ENVIRONMENTAL RECOVERY.

D. CPN CEILING/CONTRACTOR CEILING/COAST GUARD CEILING:
\$50,000.00/\$48,000/\$2,000.

E. OTHER AMPLIFYING INFO: NONE.

4. FUTURE PLANS AND RECOMMENDATIONS.

A. ASSIST EPA WITH CONTRACTOR MONITORING AS NEEDED. NEXT VACUUM OPERATIONS SCHEDULED FOR P.M. ON 02 JAN 09.

B. ARRANGE FOR TRANSPORT AND DISPOSAL OF WASTE ONCE CHARACTERIZATION IS COMPLETED.

C. COMPLETE FINANCIAL CASE PACKAGES AND FORWARD TO MLCLANT AND NPFC.

D. CO'S COMMENTS/RECOMMENDATIONS: N/A.

E. CASE PENDING//

BT

NNNN